

Exhibit A

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February 16, 2005

VIA HAND DELIVERY

George J. Wade, Esquire
Shearman & Sterling LLP
599 Lexington Avenue
New York, NY 10022

Re: Teleglob v. BCE

Dear George:

This will address issues discussed during our meet and confer held on February 15, 2002.

1. **Schimmel Email Request of February 11, 2005.** With regard to the items requested in (a) through (f) of Mr. Schimmel's email of February 11, I told you that the Debtors object to the production of those items, on the ground that they are not relevant to the issues in the case, nor reasonably calculated to lead to the discovery of admissible evidence; but that, subject to and without waiver of these objections, and subject to an agreement from BCE that production will not waive applicable privileges, Debtors will search for these items and produce what we find. I cannot give you a time frame within which production of these items will be made, in light of the fact that what has been requested will require e data searches going back nearly three years.

With regard to items (g), (h) and (i) of Mr. Schimmel's email request, I am forwarding herewith an inventory of all servers currently in our possession, and a list of names of individuals (and volume of data for each) who have e data "live" on the servers. The latter list will serve to correct the representation that I made at paragraph 11 of my letter to you dated January 31, 2005

2. **Debtors' E Data Search.** Debtors have proposed to proceed in the following way, with regard to the E Data search that we will conduct in response to BCE's requests.

- **Live Data.** With regard to the Debtors' "live" e-data identified above, as of yesterday Debtors have finished testing software that will allow them to search their live data, by key word list and date filter. The Debtors will search the combined list of key words (within the date screen you have identified) on the "live" database, once agreement is reached on the combined key word list (as discussed below). That

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search will encompass only those names on the list of 28 custodians that we previously provided to you, plus V.V. Cooke--the only individual you have added to that list.¹ If there are additional names for which you wish us to run searches on the "live" database, we will do so provided that you identify those people to us promptly, from the live e data "custodian list" that we are providing herewith.

- **Key Words**. With regard to the key word list, we will review with our IT consultant both our words and yours, in an effort to reduce and narrow the combined list. We would propose to do this within the next day or two. I will have our IT consultant communicate with yours, in an effort to facilitate this exercise.

- **Taped Data**. With regard to data from the Debtors' back up tapes, I have advised you that the Debtors currently are proposing to conduct key word searches, for the 28 custodians previously identified (plus V.V. Cooke), within the date range you have requested (1/1/99 to 5/28/02) as against the Debtors' month end back up tapes recorded on (or about) the following months end: May 2002, April 2002, March 2002, January 2002, December 2001 and February 2001.² I noted that we may also run the search on back up tapes for April 23, 2002, but have not yet determined whether to do so (or whether such exist). I have further advised that if BCE wishes for us to run other, or different searches, or to search other or different date slices, you should tell us promptly. In particular, there is a significant cost associated with this exercise. We do not wish to incur unnecessary expense.

Following these searches, I would anticipate that Debtors and their counsel will then review and produce electronic data that is responsive to your requests, and not privileged. Please be advised that when we complete our searches of both the live and taped data, pursuant to the parameters specified above, or otherwise specified or agreed, it will be our position that we have complied fully with our obligation to produce e discovery in this matter.

3. **Defendants' E Data Search**. With regard to the information contained in Mr. Schimmel's February 11, 2005 email on this subject, Mr. Schimmel was unable to tell us whether the search described under topic (b) of his February 11 email employed the date restrictions we

¹ You will note, upon review of the enclosed chart, that not all of the 28 (or 29, including Mr. Cooke) names on the original list have "live" data on the Debtors' servers--and we do not mean to suggest here that they do.

² Notably, I am now informed that monthly back ups were often done on dates other than the precise month end dates--and for a given month may span more than one day. For example, back up tapes for the end of March 2002, were apparently recorded both on Sunday, March 31, 2002 and Tuesday, April 2, 2002. In addition, we have not located a month end back up collection for May 2002. We do have, however, weekly back ups, recorded in mid-May, 2002, and currently intend to utilize those.

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requested (January 1, 2000 through December 31, 2002). Among other things, the volume numbers reflected in Mr. Schimmel's email suggest that each one of the 37 custodians we identified generated more than 22,000 emails during that time period, each of which contained one or more of the keywords used for the search. That seems high to us. Please advise.

We requested that you produce to us a tape or discs containing the results of your search, so that we may narrow and run such searches as we may need in order to derive the data we seek. We proposed that we would then copy only responsive emails and other responsive e documents, identify for you the data that we have copied, and then return to you all other data--subject to full reservation of rights regarding privileged materials (which we will return, upon your request, to be logged by you). I proposed that we engage in this exercise subject to such confidentiality provisions as may be necessary to protect data that may be unrelated to this case. As I understand our conversation, you have declined to proceed in this fashion. Please let me know if I have misunderstood your position in this regard.

As things stand, we are going to revise the key word lists over the next day, and BCE will re-run the search, and advise as to the volume of "hits" produced. We object to any further delay in this exercise. Given the schedule, and given the fact that BCE has consented only to search data that is available from the preserved hard drives and servers, we would expect that you would return to us with the search results within 3 working days from the time we submit the revised list of search terms.

4. **BCE's Backup Tapes**. We did not discuss these. Among other things, Patrick Pichette's data appears to largely be available only on backup tapes. We request that BCE search its month end backup tapes for Pichette's data. Specifically, we request that BCE search its month end tapes for August 2001 and December 2001. We reserve our right to request additional back up tape searches, upon receiving the results of the searches described above.

5. **Additional Production From BCE**. You have agreed to produce by Friday of this week the following: (i) the 3 memoranda from the summer of 2002 that Mr. Cossette identified, relating to the collection of Teleglobe related documents; (ii) the list of individuals to whom those memos were sent (and who produced responsive information); (iii) the index of the 200 to 250 boxes of Teleglobe related documents that BCE collected, as a result of this effort, as identified by Mr. Cossette. We have agreed that your production of these materials will not effect a subject matter waiver of any privileges that may apply.

You have declined to undertake (or to permit us to undertake) a comprehensive review of the boxes of documents collected by BCE in its Teleglobe archives, in order to locate documents responsive to our requests. You have stated that you believe your "review by identified custodian" method of responding is adequate--notwithstanding my concern that, under this rubric, the Debtors may only be left to guess which custodians within BCE's vast empire might have generated relevant documents. Indeed, since no one at Shearman & Sterling has yet reviewed the full collection, both you, and we, are left entirely in BCE's hands in this regard. If BCE decides a custodian who has contributed documents to the archives is relevant, then we get those documents. If BCE decides that a custodian just isn't relevant, then we don't.

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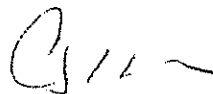
Plaintiffs are not willing to be left to BCE's mercy in this regard

Notably, we are told that about one half of the boxes collected in BCE's Teleglobe archive have already been produced--consisting of 90 to 95 boxes of Teleglobe's own documents, and another 10 or so boxes from the custodians that have been selected to date. We are apparently talking about somewhere in the neighborhood of 100 boxes that you, and BCE, have flatly refused to review--or to make available for us to review. Significantly, these are apparently the very same boxes that BCE told the Court it would be *required* to review in order to respond to our discovery requests, in Mr. Cossette's affidavit in support of your Motion to Stay.³ We are unfortunately forced to take the matter up with the Court

6. **Server and Hard Drive Data** I asked that you provide the list of individuals for whom hard drive data was imaged in 2002, as described by Mr. Cossette at or about page 94 of his deposition. Mr. Schimmel indicated that he would review that request with Mr. Cossette. I asked that you provide the listing of BCE servers, and index of users who have data stored on those servers, as requested in our motion to compel. Mr. Schimmel is researching that request.

7. **Depositions**. I advised that we anticipate that we will shortly identify individuals whom we will be seeking to depose in March. I noted that we are considering asking that you prioritize the production of e data, so that it coincides with the deposition schedule (i.e. --data from the mail box and file servers (or hard drives) relating to the witnesses identified, would be produced in expedited fashion). I asked that you advise us if there are concerns with this approach.

Very truly yours,



C. Malcolm Cochran, IV

CMC.dqc

Enclosure

cc: Gregory V. Varallo, Esq. (via e-mail)
John P. Amato, Esq. (via e-mail)
Daniel Schimmel, Esq. (via e-mail)

³ Similarly, the 5.5 million pages of electronic documents that Mr. Cossette told the Court would need to be reviewed when BCE was seeking its stay of discovery, now turns out to be something less than 800,000 pages, if Mr. Schimmel's email of February 11 is accurate.

USRLPSV03 - Live Data				
Name	Total Number of Files	Total Size of all files(GB)	Number of PST Files	PST Files
Alemieux	956	5.08	11	3.98
Amongrain	22	9.76	19	9.53
Arodriguez	944	0.77	3	0.70
Bdaicos	203	0.12	1	0.00
Bmilla	150	0.41	2	0.25
Ceakin	883	1.00	6	0.84
Dwolfe	314	1.67	3	1.29
Ctuevsky	13	0.48	6	0.48
DaDnyder	7,508	4.78	4	2.85
Dlangloi	828	2.87	60	2.70
Wlevine	2	0.00	0	0.00
Escatton	861	0.10	0	0.00
Hfields	126	0.20	1	0.02
Jbruntte	282	5.36	28	4.84
Jlunsford	695	0.19	2	0.05
Jwilds	1,678	0.85	4	0.61
Kburke	93	0.10	1	0.07
Kbustama	60	1.28	2	1.28
Kmorgan	1,076	6.68	18	6.64
Lblackmere	1,356	5.40	4	4.41
Lhaen	4,073	13.80	23	12.40
Mnyman	8,276	8.27	14	7.71
Plani	0	0.00	0	0.00
Rdecker	68	0.06	0	0.00
Rleoni	0	0.00	0	0.00
Rsciacch	4,847	9.67	17	6.77
VVCooke	423	0.47	5	0.42
Vfortuna	11	0.47	2	0.46
Skoehn	2,135	13.10	0	0.00
Rseymour	80	5.01	13	4.96
CORP DATA	25,376	7.57	50	5.00
Sub Total	59,867	87	254	61.6679

USRLPSV03 - Restored Data				
Name	Total Number of Files	Total Size of all files(GB)	Number of PST Files	PST Files
CC Vooke	3	0.7730	3	0.7730
KMorgan	15	7.5100	15	7.5100
Kbustamante	4	3.1400	4	3.1400
JBrunette	4	0.9800	4	0.9800
CEakin	1	1.8900	1	1.8900
BMilla	56	0.0925	1	0.0007
AMongrain	15	4.2000	15	4.2000

2003 December (Vfortuna)	1	1.1600	1	1.1600
2002 September (Tjarmen)	1	0.0041	1	0.0041
2002 May (Bbunin, Ppichet, Pwasington)	3	1.6800	3	1.6800
2002 March (Cchilder, Nshipley, Ppichet)	3	0.7960	3	0.7960
2002 April (Cchilder, Ppchett, Srunion, Tjarman)	4	0.4300	4	0.4300
2001 February (Bcallaha, Benns, Ccondon, Ccondon, Khumphrie, Marbouch, MarBouch, Mnyman, Sfortin, Sverge, Syager, Szhao, Tjarman, Tjarman)	14	1.3300	14	1.3300
2001 July (ACHAN. Bbunin, Nshipley, Pwashing, Rkliewer, Rseymour)	6	1.5600	6	1.5600
2001 March (ACHAN, BBUNIN, RKLIEWE, Srunion, SRUNION)	5	0.9080	5	0.9080
2001 October (AMONGRAI, BENNS, CCONDON, Khumphrie, MARBOUCH, MSTONE, SFORTIN, SVERGE)	8	2.5600	8	2.5600
Subtotal	43	9.2640	43	9.2640

USR2SAS02 - Restored Data

	Total Number of Files	Total Size of all files(GB)	Number of PST Files	PST Files Total Size
E: RESTORED I DR				
Amongrai	15	4.5000	13	4.498
Ceakin	0	0.0000	0	0.000
DaSnyder	6,321	4.3500	4	2.610
jbrunette	228	5.3800	22	5.240
kbustama	42	0.8700	2	0.866
kmorgan	1,032	0.4990	3	0.457
Rsciacc	4,501	9.3500	18	6.970
Subtotal	12,139	24.9490	62	20.6408

USRLPSV01 - Live Data

	Total Number of Files	Total Size of all files(GB)	Number of PST Files	PST Files Total Size
USRLPSV01 - F: Dr				
Root Folder Name				
Biq (2 subfolders)	31	0.0015	0	0.0000
Bsr&p (7 sub folders)	12	0.0016	0	0.0000
Corp (72 Sub folders)	2,852	1.9500	0	0.0000
FinanceFiles (12,474 sub folders)	123,935	63.1000	5	0.6290
Finance (41 sub folders)	576	0.0555	0	0.0000
HR (1,690 sub folders)	42,191	6.4600	4	0.1210
idco (1,309 sub folders)	7,502	5.2000	0	0.0000
Inet (836 sub folders)	8,179	12.5000	3	2.2000
Lcrqos (0 sub folders)	1	0.0001	0	0.0000
Legal (3,385 folders)	29,067	2.7400	2	0.0007
MagentaDB (32 sub folders)	83	1.4000	0	0.0000

Mapinfo (3 sub folders)	163	0.0024	0	0.0000
Marketing (103 subfolders)	890	0.3860	0	0.0000
MSCS (0 sub folders)	3	0.0003	0	0.0000
OA Apps (0 sub folders)	157	0.0193	0	0.0000
Prod_Apps (936 sub folders)	19,080	1.5800	0	0.0000
Prod_Apps-USMCLSV02 (1032 sub folders)	22,105	1.9400	1	0.0005
Sales (123 sub folders)	1,615	0.4240	0	0.0000
Spool -- Printer Drivers Files				
wsinst (178 sub folders)	2,648	0.5530	0	0.0000
Subtotal	261,090	98	15	2.9512
				USRESMS0
	Number of email	Volume of Data (GB)		
AMongrai	2,278	0.1159		
ARodrigu	2,137	0.4282		
BMilla	2,456	0.6216		
CEakin	20,898	1.5610		
CHopkins	1,059	0.2014		
DaSnyder	15,307			
DLanglo1	4,659	1.5835		
DSAVUSRESMS03001	470	0.0009		
DWolfe	159	0.0002		
EARACIL	5,688	0.3959		
GlobaleHR	36	0.0000		
JBrunett	4,272	0.7893		
KBustama	8,801	1.1389		
KMorgan	15,072	2.0272		
LBlackme	421	0.0570		
Legal	421	0.0570		
LHaen	222	0.0047		
Isales	9	0.0000		
MNyman	8,243	1.6002		
NetBackupExchange-USA	5	0.0000		
PLani	223	0.0218		
Postmaster.TUSA	282	0.0003		
RSciacch1	4,875	1.6575		
RSeymour	134	0.1542		
tpayrol	1	1.0000		
VCooke	1,841	0.5700		
Subtotal	99,969	13.9867		
	Total Number of Files	Total Size of all files(GB)	Number of PST Files	PST Files Total Size
Grand Total	333,139	219	374	94.52

Number of Document files = *.pdf; *.xls; *.txt; *.doc; *.ppt, *.wk*	Total Size of all identified Document files (GB)	Number of of Unknown Files	Total Size of all unidentified files (GB)
865	0.80	80	0.30
0	0.00	3	0.23
130	0.03	811	0.04
8	0.02	194	0.10
73	0.01	75	0.15
500	0.05	377	0.12
90	0.03	221	0.35
1	0.00	6	0.00
5523	1.71	1981	0.22
723	0.13	45	0.04
0	0.00	2	0.00
851	0.55	10	-0.45
44	0.00	81	0.18
38	0.00	216	0.52
421	0.11	272	0.04
111	0.03	1563	0.21
49	0.03	43	0.00
22	0.00	36	0.00
284	0.02	774	0.02
72	0.00	1280	0.99
3899	0.95	151	0.45
8256	0.57	6	-0.01
0	0.00	0	0.00
68	0.06	0	0.00
0	0.00	0	0.00
3891	2.53	939	0.37
404	0.04	14	0.01
2	0.00	7	0.00
603	0.21	1532	12.89
65	0.05	2	0.00
Exceeded Search Capabilities			
26,993		8,960	15.4579

Number of Document files = *.pdf; *.xls; *.txt; *.doc; *.ppt, *.wk*	Total Size of all identified Document files (GB)	Number of of Unknown Files	Total Size of all unidentified files (GB)
0	0.0000	0	0.00
0	0.0000	0	0.00
0	0.0000	0	0.00
0	0.0000	0	0.00
0	0.0000	0	0.00
40	0.0013	15	0.09
0	0.0000	0	0.00

0	0.0000	0	0.00
0	0.0000	0	0.00
0	0.0000	0	0.00
0	0.0000	0	0.00
0	0.0000	0	0.00
0	0.0000	0	0.00
0	0.0000	0	0.00
0	0.0000	8	-0.23
0	0.0000	0	0.00
0	0.0000	0	0.00

0	0.00000	0	0.0000
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Number of Document files = *.pdf; *.xls; *.txt; *.doc; *.ppt; *.wk*	Total Size of all identified Document files (GB)	Number of of Unknown Files	Total Size of all unidentified files (GB)
1	1	1	1
2	2	2	2
3	3	3	3
4	4	4	4
5	5	5	5
6	6	6	6
7	7	7	7
8	8	8	8
9	9	9	9
10	10	10	10
11	11	11	11
12	12	12	12
13	13	13	13
14	14	14	14
15	15	15	15
16	16	16	16
17	17	17	17
18	18	18	18
19	19	19	19
20	20	20	20
21	21	21	21
22	22	22	22
23	23	23	23
24	24	24	24
25	25	25	25
26	26	26	26
27	27	27	27
28	28	28	28
29	29	29	29
30	30	30	30
31	31	31	31
32	32	32	32
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42	42	42	42
43	43	43	43
44	44	44	44
45	45	45	45
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66	66	66	66
67	67	67	67
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91	91	91	91
92	92	92	92
93	93	93	93
94	94	94	94
95	95	95	95
96	96	96	96
97	97	97	97
98	98	98	98
99	99	99	99
100	100	100	100

LIVES from 12-03 or 01-04

2.00	0.00180	0	0.00040
0.00	0.00000	0	0.00000
5214.00	0.19800	1103	1.54200
16.00	0.00516	190	0.13484
5.00	0.00052	35	0.00348
265.00	0.02390	764	0.01810
3555.00	2.04000	928	0.34000
9,057	2.26938	3,020	2.0388

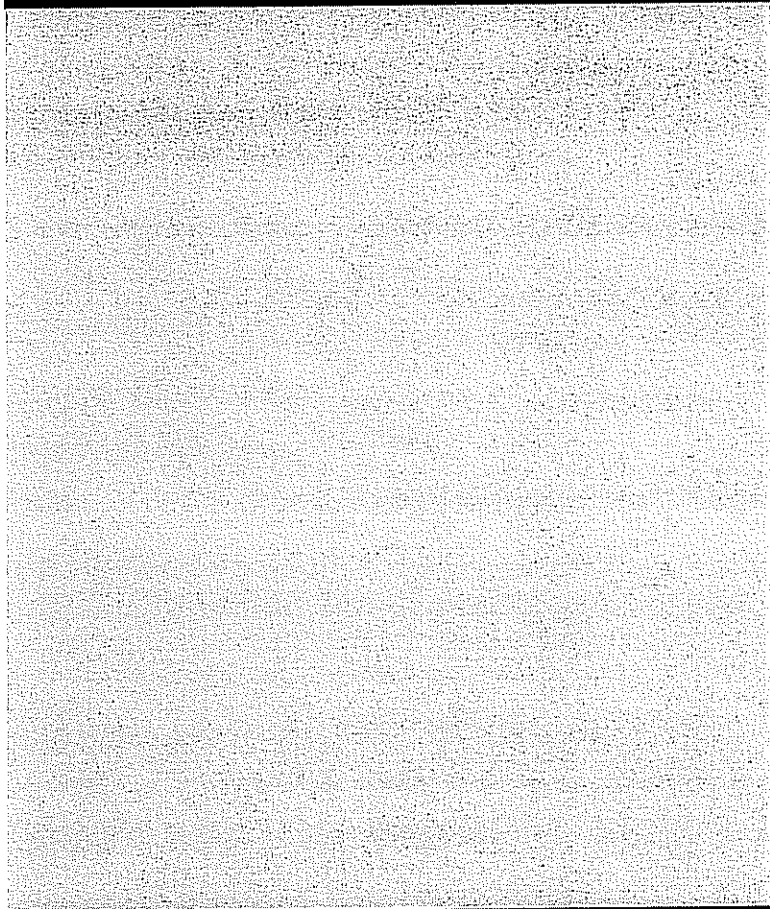
Number of Document files = *.pdf; *.xls; *.txt; *.doc; *.ppt; *.wk*	Total Size of all identified Document files (GB)	Number of of Unknown Files	Total Size of all unidentified files (GB)
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ive (Live Corp Docs Server)

0.00	0.0000	31	0.00
0.00	0.0000	12	0.00
543.00	0.0792	2309	1.87
Exceeded Search Capabilities			
4.00	0.0000	572	0.06
Exceeded Search Capabilities			
1059.00	0.8360	6443	4.36
6091.00	6.7700	2085	3.53
0.00	0.0000	1	0.00
Exceeded Search Capabilities			
36.00	0.0013	47	1.40

6.00	0.0005	157	0.00
377.00	0.3330	513	0.05
0.00	0.0000	3	0.00
5.00	0.0490	152	-0.03
Exceeded Search Capabilities			
Exceeded Search Capabilities			
1332.00	0.3380	283	0.09
0.00	0.0000	0	0.00
42.00	0.0016	2606	0.55
9,495	8	15,214	11.8851

3 - Live Mail Server



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Teleglobe USA Reston Server Listing	
Server Name	Purpose
USRESDC01	NT Primary Domain Controller
USRESDC05	NT Secondary Domain Controller
USRESAS05	Lawson Server
USRESMS05	Server for used for restore of backup tapes
USRLPSV01	Cluster Server for Corp Docs
USRLPSV02	Cluster Server for Corp Docs
USRLPSV03	Server for Individual Storage space and for common corporate documents.
USRESMS03	Email Server, Live, Exchange V5.5
USR2SAS02	Backup Server using Veritas
USRESAS02	Vantage Tax Server
USRESAS01	Vantage Tax Server